

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 7  
: :  
CAMPISI CONSTRUCTION, INC. : :  
: :  
DEBTOR : BKY. NO. 14-12458JKF

**ANSWER OF THE CHAPTER 7 TRUSTEE TO MOTION TO APPROVE  
DISPOSITION OF ABANDONED EQUIPMENT TO THE  
SECURED CREDITOR, ECI, LLC, FREE AND CLEAR OF  
LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS**

Terry P. Dershaw, the Chapter 7 Trustee herein (“Trustee”), by and through his counsel, Fox Rothschild LLP, files this Answer to the Motion of ECI, LLC (“ECI”) and, in support thereof, states as follows:

The equipment and certain assets of this bankruptcy Estate were abandoned upon the entry of an Order on June 3, 2016. The Movant, in paragraphs 23, 29, and 37 of the Motion, alleges consent by the Trustee to actions taken by ECI following the Order of abandonment. These assertions are incorrect. Once the Order of abandonment was entered, the Trustee and his undersigned counsel took no position regarding the equipment or the filing of any legal documents.

It is incorrect to state that the Trustee permitted ECI to collect or assemble the assets. Those assets were no longer part of the Estate, and the Trustee was not a party to any effort to collect or assemble assets.

It is also incorrect to state that the Trustee consented to the perfection of the security interest of ECI. The Trustee, again, had no interest in the property and was not a party to any effort to perfect or file documents on behalf of ECI.

The Order of abandonment pursuant to §554 of the Bankruptcy Code is a final and unappealable Order. The Trustee has no position regarding the abandoned assets or regarding the relief requested herein.

Respectfully submitted,

FOX ROTHSCHILD LLP

By: /s/ Edward J. DiDonato  
Edward J. DiDonato  
2000 Market Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19103  
[edidonato@foxrothschild.com](mailto:edidonato@foxrothschild.com)  
Counsel to Trustee